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7 Attorneys for Plaintiff
VERIGY US, INC.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 VERIGY US, INC, a Delaware Corporation

12 Plaintiff,

13 vs.

14 ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
15 TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
16 California Limited Liability Corporation,
inclusive,

17 Defendants.
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Case No. C07 04330 RMW (HRL)

**DECLARATION OF MELINDA M.
MORTON IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE DOCUMENTS UNDER
SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

Complaint Filed: August 22, 2007
Trial Date: None Set

1 I, Melinda M. Morton, declare as follows:

2 1. I am an attorney licensed to practice law before all of the courts of the State of
3 California. I am an associate with the law firm of Bergeson, LLP, counsel of record for Plaintiff
4 Verigy US, Inc. ("Verigy" or "Plaintiff") in the above-captioned action. I have personal
5 knowledge of the facts set forth in this declaration, and, if called to do so, I could and would
6 competently testify thereto.

7 2. I submit this declaration in support of Verigy's Administrative Motion for Leave to
8 File Document Under Seal.

9 3. I have reviewed Exhibit A to Verigy's Amended Proposed Order Granting Plaintiff
10 Verigy Us, Inc.'s Application for Temporary Restraining Order, Order to Show Cause re:
11 Preliminary Injunction, and an Order Authorizing Expedited Discovery (the "Materials").

12 4. I have determined that these Materials (hereafter "the Materials") each disclose
13 information that has been designated as "Confidential" by Verigy because it contains confidential,
14 proprietary and trade secret information relating to Verigy's design specifications, technical
15 procurement processes; research regarding customer device requirements; block diagrams; product
16 development and strategic plans, product strategy; forecasted business demand; actual product
17 consumption; business processes and tools; product technology roadmaps; product features and
18 performance; product architecture; product development schedules; qualification processes and
19 results; contract manufacturer agreements and business relationship; inventions; provisional patent
20 applications; and future manufacturing strategies (collectively, the "Trade Secrets").

21 5. The confidentiality interest of the parties therefore overcomes the right of public
22 access to the record, as a substantial probability exists that the parties' overriding confidentiality
23 interest will be prejudiced if the record is not sealed. Further, the proposed sealing is narrowly
24 tailored and no less restrictive means exist to achieve this overriding interest.

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that this declaration was executed this 23rd day of August, 2007
3 at San Jose, California.

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5 _____/s/
6 Melinda M. Morton
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